

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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MAR 18 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Implementation of the Cable
Television Consumer Protection
and Competition Act of 1992:

Cable Home Wiring

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MM Docket No. 92-260

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COMMENTS
OF THE
UNITED STATES TELEPHONE ASSOCIATION

The United States Telephone Association (USTA) respectfully submits its comments in the above referenced proceeding. USTA is the principal trade association of the exchange carrier industry. Its members provide over 98 percent of the exchange carrier-provided access lines in the United States.

The Commission has taken commendable steps to further the goal of competition in the provision of cable home wiring. USTA supports the Commission's decision to reduce from 30 days to 7 days the prescribed time period within which a cable operator may remove cable home wiring. This will provide the operator with a reasonable opportunity to remove the wire. More important, it eliminates the unreasonable delay that customers have been forced to endure either to install new wiring or to use the abandoned wiring.

USTA also agrees that the four-step process by which consumers can obtain information related to purchasing their home wiring upon termination and using the wiring to connect to an alternative provider is an easy and cost-effective procedure that will meet the needs of the

consumers and the service providers alike.

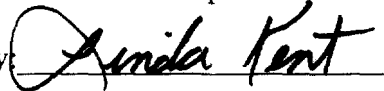
LOOP-THROUGH WIRING

USTA continues to assert that future loop-through installations should be prohibited because they disadvantage the cable subscriber in a number of ways. First, consumers on a loop-through system are denied the opportunity to choose an alternative supplier. Second, since these consumers cannot purchase the wiring, they are prevented from reconfiguring the wiring within their dwellings to suit their needs (interior design, change in usage of a room). Third, if a service problem developed or if a cable were accidentally cut or disabled, multiple subscribers are affected. The inherent limitations of loop-through systems make them inappropriate for a truly competitive environment in which the unique requirements of cable consumers should be served. USTA recommends that a building owner be permitted the opportunity to purchase the wiring and common equipment in loop-through installations only if individual tenants are also permitted to install or to have installed any additional wiring and exercise their independent rights to terminate service and interconnect with another provider.

The ultimate goal should be for each customer to have the freedom to make her/his own choice. Rules that permit replacing one entity with the power to make decisions for all individuals with another entity possessing the same power is not supportable in the current competitive environment.

Respectfully submitted,

United States Telephone Association

By: 

Mary McDermott
Linda Kent
Charles D. Cosson

Its Attorneys:

Paul Hart
Vice President, Technical Disciplines

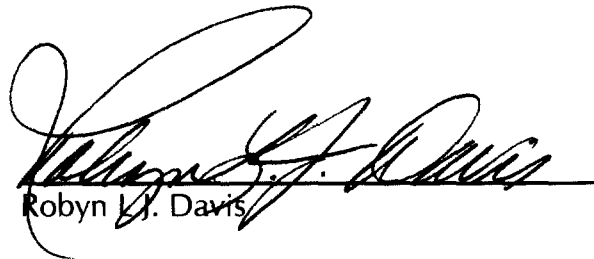
Kathy Woods
Director, Legal and Regulatory Affairs

March 18, 1996

1401 H Street NW - Suite 600
Washington, DC 20005
(202) 326-7248

CERTIFICATE OF SERVICE

I, Robyn L.J. Davis, do certify that on March 18, 1996 comments of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.



Robyn L.J. Davis

Bill Unseld
Square D Company
3201 Nicholasville Road
Lexington, KY 40503

Robert Sachs
Howard Homonoff
Continental Cablevision, Inc
Lewis Wharf, Pilot House
Boston, MA 02110

Frank Lloyd
Mintz, Levin, Cohn, Ferris, Glovsky
and Popeo, P.C.
701 Pennsylvania Ave, NW
Suite 900
Washington, DC 20004

Stephen Effros
James Ewalt
Community Antenna Television Assn.
3950 Chain Bridge Road
Fairfax, VA 22030

Jeffrey Sheldon
Utilities Telecommunications Council
1140 Connecticut Ave., NW
Suite 1140
Washington, DC 20036

American Public Power Association
Baller Hammett, PC
1225 Eye Street, NW
Washington, DC 20005

Aaron Fleischman
Arthur Harding
Jill Kleppe McClelland
Fleischman and Walsh
1400 16th Street, NW
Suite 600
Washington, DC 20036

Robert Bader
BICSI
10500 University Center Drive
Suite 100
Tampa, FL 33612

James Hobson
Donelan, Cleary, Wood & Maser
1275 K Street, NW
Suite 850
Washington, DC 20005

John Davis
Donna Coleman Gregg
Wiley, Rein & Fielding
1776 K Street, NW
Washington, DC 20006

William B. Barfield
Thompson Rawls II
BellSouth Corporation
Suite 1800
1155 Peachtree Street, NE
Atlanta, GA 30309-3610

Norman Sinel
Patrick Grant
Stephanie Phillippis
Bruce Henoch
Arnold & Porter
555 12th Street, NW
Washington, DC 20004

Eileen Huggard
Cable Television Franchises and
Policy
New York City Department of
Telecommunications and Energy
75 Park Place
Sixth Floor
New York, NY 10007

Deborah Costlow
Thomas Power
Winston & Strawn
1400 L Street, NW
Suite 700
Washington, DC 20005

Howard Symons
Keith Barritt
Mintz, Levin, Cohn, Ferris, Glovsky
and Popeo, PC
701 Pennsylvania Ave., NW
Suite 900
Washington, DC 20004

Robert Lemle
Cablevision Systems Corporation
One Media Crossways
Woodbury, NY 11797

Daniel Brenner
Loretta Polk
NCTA, Inc.
1724 Massachusetts Ave., NW
Washington, DC 20036

Deborah Haraldson
Mary McDermott
NYNEX
120 Bloomingdale Road
White Plains, NY 10605

Terry Mahn, Esq.
Fish & Richardson
601 13th Street, NW
5th Floor North
Washington, DC 20005

Gigi Sohn
Andrew Jay Schwartzman
Media Access Project
2000 M Street, NW
Washington, DC 20036

John Muehlstein
Federsen & Koupt
180 North LaSalle, Suite 3400
Chicago, IL 60601

Philip Verveer
Sue Blumenfeld
Wilkie Farr & Gallagher
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20036

William Finneran
New York State Commission on Cable
Television
Corning Tower Bldg.
Empire State Plaza
Albany, NY 12223

George Schwartz
549 Fairfield Road
East Windsor, NJ 08520

Stuart Feldstein
Fleischman & Walsh
1400 Sixteenth Street, NW
Washington, DC 20036

Paul Schwedler
Carl Wayne Smith
Defense Information Systems Agency
701 S. Courthouse Road
Arlington, VA 22204

Nancy Woolf
James Tuthill
Pacific Bell/Nevada Bell
140 New Montgomery Street
Room 1523
San Francisco, CA 94105

James Wurtz
William Adler
Pacific Telesis
1275 Pennsylvania Avenue, NW
Washington, DC 20004

John Cole, Jr.
Paul Glist
Cole, Raywid & Braverman
1919 Pennsylvania Ave., NW
Suite 200
Washington, DC 20006

Rose Helen Perez
Times Mirror Cable Television, Inc.
2381-2391 Morse Avenue
Irvine, CA 92714

Paul Sinderbrand
Dawn Alexander
888 16th Street, NW
Suite 610
Washington, DC 20036

James Meyers
Baraff, Koerner, Olender, &
Hochberg, PC
5335 Wisconsin Avenue, NW
Suite 300
Washington, DC 20015

Edward Hummers, Jr.
Paul Feldman
Fletcher, Heald, & Hildreth
1300 17th Street North
11th Floor
Arlington, VA 22209

Michael Glover
Bell Atlantic Telephone Companies
1310 North Court House Road
Eighth Floor
Arlington, VA 22201

W. James MacNaughton
Liberty Cable Company, Inc.
90 Woodbridge Center Drive
Suite 610
Woodbridge, NJ 07095

Henry Rivera
Ginsburg, Feldman and Bress, Chtd.
1250 Connecticut Avenue, NW
Suite 800
Washington, DC 20036

International Transcription Service
2100 M Street, NW
Suite 140
Washington, DC 20036

Vicki Mason
Telecommunications Reports
1333 H Street, NW
11th Floor, West Tower
Washington, DC 20005

Ted Coombes
American Public Power Assn.
2301 M Street, NW
Washington, DC 20037

Alan I. Robbins
James Baller
Mary Ann Hammett
Baller Hammett, P.C.
1225 Eye Street, NW
Washington, DC 20005

James L. Casserly
Squire, Sanders & Dempsey
1201 Pennsylvania Avenue, NW
P.O. Box 407
Washington, DC 20044